

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Thomas Vanaskie (Ret.),
Special Discovery Master

DECLARATION OF SETH A. GOLDBERG

I, Seth A. Goldberg, of full age, hereby declare as follows:

1. I am an attorney at law of the State of New Jersey, a member of good standing of the bar of this Court, a Partner with the law firm of Duane Morris LLP, and counsel to Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), Princeton Pharmaceutical Inc. (“Princeton”), Solco Healthcare U.S. (“Solco”), and Huahai U.S. Inc. (“Huahai U.S.”, and collectively with ZHP, Princeton, and Solco, “the ZHP Parties”).

2. I make this Declaration based on personal knowledge and in support of the ZHP Parties’ Reply Brief in Further Support of their Objection to Special Master Order No. 35 Compelling the Production of Documents Prohibited from Production under Chinese Law.

3. Attached to this Declaration as **Exhibit A** is a true and correct copy of a declaration executed by Yang Xueyu, a partner of Yun Zheng Law Firm.

Executed on September 27, 2021.

Respectfully submitted,

By: /s/ Seth A. Goldberg

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